ASHBY & GEDDES

ATTORNEYS AND COUNSELLORS AT LAW

500 DELAWARE AVENUE

P. O. BOX 1150

WILMINGTON, DELAWARE 19899

TELEPHONE 302-654-1888 FACSIMILE 302-654-2067

.....

December 7, 2022

The Honorable Gregory B. Williams United States District Court 844 N. King Street Wilmington, DE 19801 **VIA ELECTRONIC FILING**

Re: Bear Box LLC, et al. v. Lancium LLC, et al.,

C.A. No. 21-534- GBW-CJB

Dear Judge Williams,

As requested at the close of trial yesterday, plaintiffs enclose citations to Dr. McClellan's expert reports and prior deposition testimony in connection with the demonstratives plaintiffs intend to use during Dr. McClellan's direct examination.

Respectfully,

/s/ Andrew C. Mayo

Andrew C. Mayo (#5207)

ACM/mlk

cc: All counsel of record (via electronic mail) enclosure

PDX No.	Title	Citations
3.23	Storms' .CSV File Describes Intervals and Maintained Power Usage or Reduction	The following citations support Dr. McClellan's opinions with respect to the conception documents shown in the slide. Expert Report: ¶¶ 171-78; 300-301 Reply Report: ¶¶ 73-79 Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
3.25	Storms' .CSV File Describes Profiting By Reducing Power Usage	The following citations support Dr. McClellan's opinions with respect to the conception document shown in the slide. Expert Report: ¶¶ 171-78; 300-301 Reply Report: ¶¶ 73-79 Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
3.27	The '433 Patent Mimics The Imagery In Storms	The following citations support Dr. McClellan's opinions with respect to the remote control system shown in the slide. Expert Report: ¶¶ 221-224 Deposition: 170:15-171:5
3.29	The Court's Claim Construction	The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation shown in the slide. Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301 Reply Report: ¶¶ 73-79 Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19 The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation shown in the slide. Expert Report: ¶¶ 62-63, 171-178, 300-301 Reply Report: ¶¶ 227, 244 Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19

PDX No.	Title	Citations
3.33	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 187-188

PDX No.	Title	Citations
3.34	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 187-188

PDX No.	Title	Citations
3.35	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to the conventionality of power option agreements and QSE.
		Expert Report: ¶¶ 63, 121, 234
		Reply Report: ¶¶ 27, 77, 124, 243, 260
		Deposition: 260:9-262:15
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 187-188
		""

PDX No.	Title	Citations
3.36	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 189-190

PDX No.	Title	Citations
3.37	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 189-190

PDX No.	Title	Citations
3.38	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 191-192

PDX No.	Title	Citations
3.39	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 1 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 189-190

PDX No.	Title	Citations
3.40	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 2 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 193-196

PDX No.	Title	Citations
3.41	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 2 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 193-196

PDX No.	Title	Citations
3.42	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 2 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 193-196

PDX No.	Title	Citations
3.43	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 3 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 197-200

PDX No.	Title	Citations
3.44	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the "power
	Features of Claim 4 (TX157)	option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12;
		214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the
		"minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-
		233:14; 237:6-15; 257:9-259:19
		The full and a site of the same of Da McCl. 11 and a same of the s
		The following citations support Dr. McClellan's opinions with respect to this
		limitation as a whole.
		Expert Report: ¶¶ 202-205

PDX No.	Title	Citations
3.45	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 5 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 206-209

PDX No.	Title	Citations
3.46	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 6 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 210-213

PDX No.	Title	Citations
3.47	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 6 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 210-213

PDX No.	Title	Citations
3.48	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the "power
	Features of Claim 6 (TX157)	option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to the conventionality of power option agreements and QSE. Expert Report: ¶¶ 63, 121, 234
		Reply Report: ¶¶ 27, 77, 124, 243, 260
		Deposition: 260:9-262:15
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 210-213

PDX No.	Title	Citations
3.49	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 7 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 214-216 (including mis-numbered paragraph [2] on pp. 66-67)

PDX No.	Title	Citations
3.50	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 7 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 214-216 (including mis-numbered paragraph [2] on pp. 66-67)

PDX No.	Title	Citations
3.51	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 8 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 217-220

PDX No.	Title	Citations
3.52	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 8 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 217-220

PDX No.	Title	Citations
3.53	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 9 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 221-224

PDX No.	Title	Citations
3.54	Storms Communicated The Features of Claim 9 (TX157)	The following citations support Dr. McClellan's opinions with respect to the remote control system shown in the slide.
		Expert Report: ¶¶ 221-224
		Deposition: 170:15-171:5
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation shown in the slide.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 68:8-16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation shown in the slide.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-
		233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this
		limitation as a whole.
		Expert Report: ¶¶ 221-224

PDX No.	Title	Citations
3.55	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the "power
	Features of Claim 10 (TX157)	option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12;
		214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the
		"minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-
		233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this
		limitation as a whole.
		Expert Report: ¶¶ 225-226

PDX No.	Title	Citations
3.56	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 11 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 227-230

PDX No.	Title	Citations
3.57	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 11 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 227-230

PDX No.	Title	Citations
3.58	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 11 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 227-230

PDX No.	Title	Citations
3.59	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the "power
	Features of Claim 12 (TX157)	option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to the conventionality of power option agreements and QSE. Expert Report: ¶¶ 63, 121, 234
		Reply Report: ¶¶ 27, 77, 124, 243, 260
		Deposition: 260:9-262:15
		Deposition, 200.9-202.13
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 231-234

PDX No.	Title	Citations
3.60	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 13 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 235-237

PDX No.	Title	Citations
3.61	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 14 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following citations support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 238-241

PDX No.	Title	Citations
3.62	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 15 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 242-244

PDX No.	Title	Citations
3.63	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 16 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply Report: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply Report: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 245-250

PDX No.	Title	Citations
3.64	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 16 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 245-250

PDX No.	Title	Citations
3.65	Storms Communicated The Features of Claim 16 (TX157)	The following citations support Dr. McClellan's opinions with respect to the conception documents shown in the slide. Expert Report: ¶¶ 171-78; 300-301 Reply: ¶¶ 73-79 Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation. Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301 Reply: ¶¶ 73-79 Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation. Expert Report: ¶¶ 62-63, 171-178, 300-301 Reply: ¶¶ 227, 244 Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 245-250
3.66	Storms Communicated The Features of Claim 17 (TX157)	Same objections as slides 33-39 discussing claim 1. The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 251-256

PDX No.	Title	Citations
3.67	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 18 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 257-262
		Expert Report. 257-202

PDX No.	Title	Citations
3.68	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 18 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole.
		Expert Report: ¶¶ 257-262

PDX No.	Title	Citations
3.69	Storms Communicated The	The following citations support Dr. McClellan's opinions with respect to the
	Features of Claim 18 (TX157)	conception documents shown in the slide.
		Expert Report: ¶¶ 171-78; 300-301
		Reply: ¶¶ 73-79
		Deposition: 208:16-209:8; 232:10-233:22; 234:14-237:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		The following citations support Dr. McClellan's opinions with respect to the "minimum power threshold" limitation.
		Expert Report: ¶¶ 62-63, 171-178, 300-301
		Reply: ¶¶ 227, 244
		Deposition: 89:14-17; 126:7-12; 128:8-129:8; 153:1-22; 218:23-219:19; 232:10-233:14; 237:6-15; 257:9-259:19
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 257-262
		Expert Report. 231-202

PDX No.	Title	Citations
3.70	Storms Communicated The Features of Claim 18 (TX157)	The following citations support Dr. McClellan's opinions with respect to the use of cgminer in Mr. Storms' system. Expert Report: ¶¶ 57, 60, 64, 67, 70, 75, 80, 86, 106, 110, 117, 141, 153, A.2, A.5 Reply: ¶¶ 248
		The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 257-262
3.71	Storms Communicated The Features of Claim 19 (TX157)	Same objections as slides 33-9 and 46-50, discussing claims 1, 6 and 7. The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 263-266.
3.72	Storms Communicated The Features of Claim 20 (TX157)	Same objections as slides 33-9, discussing claim 1. The following portions of his original report generally support Dr. McClellan's opinions with respect to this limitation as a whole. Expert Report: ¶¶ 268-274

PDX No.	Title	Citations
3.73	Why Dr. Ehsani Is Wrong	The following citations support Dr. McClellan's opinions with respect to the
	About Storms' System	conventionality of power option agreements and QSE.
		Expert Report: ¶¶ 63, 121, 234
		Reply: ¶¶ 27, 77, 124, 243, 260
		Deposition: 260:9-262:15
		The following citations support Dr. McClellan's opinions with respect to the "power option agreement" limitation.
		Expert Report: ¶¶ 62-63, 171-178; 187-190; 300-301
		Reply: ¶¶ 73-79
		Deposition: 67:9-68:16; 136:22-137:21; 164:11-18; 165:21-166:12; 201:2-202:12; 214:24-215:12; 219:13-19
		Reply: ¶¶ 73, 76-78, 99
3.74	Why Dr. Ehsani Is Wrong About The '632 Application	Reply: ¶¶ 14-16
3.77	Why Mr. Baer is Wrong	Reply: ¶ 243, 227, 241